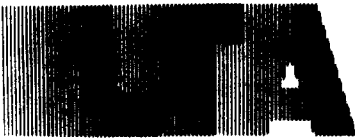


RECEIVED

SEP 10 1991

Federal Communications Commission
Office of the Secretary



**Leslie Taylor
Associates**

Telecommunications Consultants
6800 Carlynn Court
Bethesda, Maryland, 20817-4302
Tel: (301) 229-9341
Fax: (301) 229-3148

10 L.
September 8, 1991

ORIGINAL
FILE

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: RM-7771 of Constellation Communications, Inc. and RM-7773 of TRW Inc.

Dear Ms. Searcy:

Attached is a request of Loral Cellular Systems, Corp. for an extension of time in which to comment on the above-referenced rulemaking petitions.

If you have any questions, please contact the undersigned.

Sincerely yours,



Leslie A. Taylor

cc: Raymond LaForge, Office of Engineering and Technology
Fern Jarmulnek, Common Carrier Bureau

SEP 10 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

**Petitions for Rulemaking of
Constellation Communications, Inc.
TRW Inc.**

To Amend the Commission's Rules with
regard to Low-earth Orbit Satellite
Systems Operating in the RDSS Bands

(1) the applications of petitioners are two of a group of applications to be considered pursuant to the Commission's Public Notice DA 91-407, Report No. DS-1068, released April 1, 1991, establishing a processing group for radiodetermination satellite service (RDSS) system proposals;

(2) many of the issues addressed by the rulemaking petitions are addressed in the applications of the petitioners, as well as the applications of other parties, including that of LCSC;

(3) consolidated comments on the rulemaking petitions and the applications will enable parties to file one set of comments, instead of two, addressing the same or similar issues raised by the rulemaking petitions and the applications;

(4) the original Public Notice issued by the Commission did not clearly indicate that comments were being sought solely on the rulemaking request; and a clarifying public notice was issued on August 29, 1991 indicating that the requests for Pioneer's Preference would be considered separately. This confusion has led to a delay in LCSC's evaluation of the rulemaking petitions.

(5) the Commission's resources, as well as those of commenting parties, would be conserved by utilizing a consolidated pleading cycle.

LCSC counsel has been advised by counsel for Constellation Communications, Inc., that it has no objection to an extension of time in this matter. LCSS counsel has advised counsel for TRW Inc. of this filing.

Wherefore, for the forgoing reasons, LCSC requests an extension of time and consolidated pleading cycle for filing comments with regard to RM-7771 and RM-7773.

Respectfully submitted,

LORAL CELLULAR SYSTEMS, CORP.

By: Leslie A. Taylor

Leslie A. Taylor
Its Attorney

September 10, 1991

Leslie A. Taylor
Leslie Taylor Associates
6800 Carlynn Court
Bethesda, MD 20817
(301) 229-9341

CERTIFICATE OF SERVICE

I, Andrew Taylor, hereby certify that I have on this ^{10th} ~~7~~th day of September, 1991 caused to be sent copies of the foregoing "Petition of Loral Cellular Systems, Corp. for Extension of Time" by U.S. mail, postage prepaid, to the following:

Gary M. Epstein
James F. Rogers
Kevin C. Boyle
Latham & Watkins
1001 Pennsylvania Avenue N.W.
Suite 1300
Washington, D.C. 20004-2504

Robert A. Mazer
Albert Shuldiner
Nixon, Hargrave, Devans & Doyle
One Thomas Circle N.W.
Suite 800
Washington, D.C. 20005

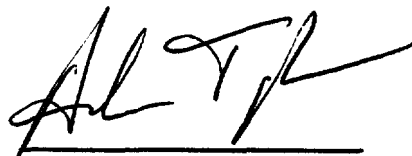
Jill Abeshouse Stern
Miller & Holbrooke
1225 Nineteenth Street N.W.
Washington, D.C. 20036

Philip L. Malet
Steptoe & Johnson
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Veronica Haggart, Esq.
Vice President & Director
Regulatory Affairs
Motorola, Inc.
1350 I Street N.W.
Washington, D.C. 20005

Norman P. Levanthal
Raul Rodriguez
Stephen D. Baruch
Leventhal, Senter & Lerman
2000 K Street N.W.
Suite 600
Washington, D.C. 20006

Lon Levin, Esq.
Gurman, Kurtis, Blask
& Freedman
1400 16th Street N.W.
Suite 500
Washington, D.C. 20036



Andrew Taylor